

# EXHIBIT 1

**From:** [Houghton-Larsen, M Annie](#)  
**To:** [Maria Ryan](#)  
**Cc:** [dubose@dubosemiller.com](mailto:dubose@dubosemiller.com); [Nathan, Aaron E.](#); [Governski, Meryl Conant](#)  
**Subject:** RE: Response  
**Date:** Thursday, November 14, 2024 6:14:17 PM  
**Attachments:** [2024-11-14 MTC Ryan, Goodman, and Medrano For Service.pdf](#)  
[2024-11-14 Combined 3P Subpoena - Maria Ryan.pdf](#)  
[2024.11.14 Order re MTC.pdf](#)

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Dr. Ryan,

We are not aware that you are currently represented in connection with this action, please direct me to your attorney if that is incorrect.

I am attaching a motion to compel, the Court's order regarding the same, and a subpoena to this email. Please confirm your acceptance of service.

Thank you,  
Annie

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
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Pronouns: she, her, hers

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**From:** Nathan, Aaron E. <ANathan@willkie.com>  
**Sent:** Tuesday, November 5, 2024 5:04 PM  
**To:** Maria Ryan <mariaryannh@gmail.com>  
**Cc:** [dubose@dubosemiller.com](mailto:dubose@dubosemiller.com); Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Subject:** RE: Response

Ms. Ryan,

I am writing regarding your response to the information subpoena regarding Ms. Freeman and Ms. Moss's judgment enforcement efforts against Mr. Giuliani. We are currently unaware of any counsel that you may have retained in connection with this matter. If you have retained counsel in connection with this matter, please inform me immediately and please also forward this communication to your counsel.

We became aware today that you are the manager and part owner of Standard USA LLC, a Florida limited liability company formed on August 30, 2024, two weeks after your response to the information subpoena served on you. Please immediately supplement your answers to the information subpoena to include any information regarding that entity responsive to the subpoena.

The following questions are in addition to your continuing obligation to correct or supplement your answers to the information subpoena should your answers change. For purposes of your answers to the below, please include Standard USA LLC within the definition of "Giuliani Entities."

For Request 7, which asks you to identify transfers of money, you responded that "I am an employee. Get direct deposit from Giuliani Communications." Per the Request, please specifically identify the amount of each direct deposit, the date, the name of the institution and account from which the direct deposit was made. Please also identify any other transfers from any of the Giuliani Entities to you.

For Request 8, which asks you to list all gifts given to you by Mr. Giuliani, please confirm that this is a complete accounting of all gifts. For example, in December 2023, there was public reporting that you and Mr. Giuliani went shopping for luxury jewelry and that he purchased you a ring valued at approximately \$60,000.

In response to Requests 10 and 11, you responded that you assisted with Mr. Giuliani's bankruptcy for 2 months, but that you did not have access to any of his accounts or receive any financial reports during that time. Please identify what specific information and documents you were provided/had access to in order to assist with the bankruptcy for 2 months.

In response to Request 15, you responded that "I have paid for his heart medications when he couldn't afford them. I have purchased other things. He tries to pay me back when he can." Please identify each repayment with specificity in response to Request 7.

New York law provides that answers to information subpoenas must be made in writing under oath, a requirement that is intended to "impress" the "importance of answering truthfully." N.Y. C.P.L.R. 5224. To that end, please provide the requested clarifications and return the subpoena with answers sworn under oath. Please advise if you have any questions or if you have retained counsel to represent you in this matter. Plaintiffs reserve all rights.

Thank you,  
Aaron

**Aaron E. Nathan**  
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**From:** Maria Ryan <[mariaryannh@gmail.com](mailto:mariaryannh@gmail.com)>  
**Sent:** Friday, August 16, 2024 8:19 PM  
**To:** [dubose@dubosemiller.com](mailto:dubose@dubosemiller.com); Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Subject:** Response

\*\*\* EXTERNAL EMAIL \*\*\*

Sent from my iPhone